

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JASON ALLEN CULVERSON,)	Case No. 1:21-cv-1033-EPG
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	SECOND EXTENSION OF TIME
vs.)	(ECF No. 14)
)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 35-day extension of time, from March 4, 2022 to April 8, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for this extension. As this Court is well aware, Social Security case filings in federal court increased due to a combination of factors including an increase in appeals council decisions and an increase in hearings at the administrative levels. Then, as a result of the pandemic, shelter-in-place mandates, and Court ordered Stays, there were significant delays in producing transcripts. In

1 recent months, Counsel for the Plaintiff has received a greater-than-usual number of Answers
2 and Certified Administrative Records from defendant including over 60 cases in November and
3 December 2021.

4 For the weeks of February 28, 2022 and March 7, 2022, Counsel for Plaintiff has 14
5 merit briefs, and several letter briefs and reply briefs. For the remainder of the month of March
6 2022, Counsel has over 18 additional merit briefs, in addition to reply briefs, and EAJA motions.

7 Furthermore, Counsel for the Plaintiff has a pre-planned major surgery the week of
8 March 14, 2022. Lastly, another attorney with the firm, Ms. Dolly Trompeter, is currently out of
9 state due to her father's medical condition and as a result, the undersigned has taken on
10 additional matters compounding the need for an additional extension.

11 Counsel for the Plaintiff does not intend to further delay this matter. Defendant does not
12 oppose the requested extension. Counsel apologizes to the Defendant and Court for any
13 inconvenience this may cause.

14
15 Respectfully submitted,

16 Dated: February 23, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

17
18 By: /s/ Jonathan Omar Pena
19 JONATHAN OMAR PENA
Attorneys for Plaintiff

20
21 Dated: February 23, 2022

PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

22
23
24
25
26 By: */s/ Patrick Snyder
Patrick Snyder
Special Assistant United States Attorney
Attorneys for Defendant
27
28 (*As authorized by email on February 23, 2022)

ORDER

Based on the above stipulation (ECF No. 14), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment no later than April 8, 2022. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **February 25, 2022**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE